**DEFENDANT'S** 

**EXHIBIT** 

# alockton@mchaleslavin.com

From: James H Freeman < jfreeman@sanderslaw.group>

**Sent:** Friday, April 12, 2024 3:04 PM alockton@mchaleslavin.com

Cc: emchale@mchaleslavin.com; litigation@mchaleslavin.com; Craig Sanders

**Subject:** Re: Global Weather v. Joe Pags Media, 23-cv-1350 (WD. Tex.)

#### Andrew:

Plaintiff is amenable to vacating default on thew terms agreed, but we are not preparing the paperwork. Please file an NOA and prepare the stipulation in due course.

We would like to resolve dispute and we made an opening demand of \$24K on 3/6 but never received a counter-offer. So ball is in your court.

Best.

**James** 

From: alockton@mchaleslavin.com <alockton@mchaleslavin.com>

Sent: Friday, April 12, 2024 2:27 PM

To: James H Freeman < jfreeman@sanderslaw.group>

Cc: emchale@mchaleslavin.com <emchale@mchaleslavin.com>; litigation@mchaleslavin.com

litigation@mchaleslavin.com>; Craig Sanders <csanders@sanderslaw.group>

Subject: RE: Global Weather v. Joe Pags Media, 23-cv-1350 (WD. Tex.)

Hi James,

I wanted to follow up and make sure you saw our email (with attachments) from April 3<sup>rd</sup> (provided again, attached hereto). As you should recall, when we previously spoke we discussed that you were going to send us a joint stipulation to set aside the clerk's default and set a 60-day period to respond to the complaint, during which time you and your client could assess whether it still desired to pursue copyright infringement claims against Joe Pags Media, LLC, or instead, if you agree with us, that your client would elect to dismiss the current case and either file a suit against the proper defendant M3 Media Management (as addressed in the attached email and its attachments) or we could attempt to resolve the dispute between Global Weather and M3.

Please confirm receipt of this email, and of the April 3<sup>rd</sup> email attached hereto. After you've reviewed the April 3<sup>rd</sup> correspondence, please let us know how you'd like to proceed. Thank you.

### Sincerely,

#### **Andrew D. Lockton**

## McHALE & SLAVIN, P.A.

2855 PGA Boulevard

Palm Beach Gardens, Florida 33410

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From: alockton@mchaleslavin.com <alockton@mchaleslavin.com>

Sent: Wednesday, March 13, 2024 4:27 PM

To: jfreeman@sanderslaw.group

**Cc:** emchale@mchaleslavin.com; litigation@mchaleslavin.com **Subject:** Global Weather v. Joe Pags Media, 23-cv-1350 (WD. Tex.)

Hi James,

I just wanted to follow up with you following our phone call a couple of minutes ago. In future correspondence, please use the email addresses in this email to reach us, specifically <a href="mailto:litigation@mchaleslavin.com">litigation@mchaleslavin.com</a> will be received by both me and Ed McHale.

We look forward to your draft stipulation to set aside the clerk's default and set a 60 day period to respond to the complaint. In the interim, I'll work on getting together documentation to show you that M3 is the only proper defendant for this matter and then we can discuss continuing the case in SDNY instead of WD Tex. Thank you.

## Sincerely,

# **Andrew D. Lockton**

#### McHALE & SLAVIN, P.A.

2855 PGA Boulevard Palm Beach Gardens, Florida 33410

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E-mail: <u>ALockton@McHaleSlavin.com</u>



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